

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE  
COMPANY,

Defendant.

Case No. 2:24-cv-00093-JRG-RSP  
(Lead Case)

**JURY TRIAL DEMANDED**

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES  
CORP.,

Defendant.

Case No. 2:24-CV-00064-JRG-RSP  
(Member Case)

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION FOR EXTENSION AND TO AMEND THE DOCKET  
CONTROL ORDER**

Plaintiff VirtaMove Corp. (“VirtaMove”) respectfully moves the Court extend the opening expert report deadline by three days in the above-captioned case for VirtaMove and Hewlett Packard Enterprise Company (“HPE”), and one week in the above-captioned case for VirtaMove and International Business Machines Corp. (“IBM”) (collectively, the “Parties”). Specifically, the Parties ask that the deadline to file opening expert reports be extended from June 16, 2025 to June 19, 2025 (HPE) and June 23, 2025 (IBM), with all following deadlines modestly shifted pursuant to the attached Exhibit. This request is unopposed.

Good cause exists for this extension. Specifically, VirtaMove's expert suffered a medical issue that has impacted his ability to meet the original deadline. Additionally, certain of VirtaMove's team members have trial conflicts in *Headwater Research LLC v Cello Partnership d/b/a Verizon Wireless*, Case No. 2:23-cv-352 (E.D. Tex.). VirtaMove has diligently corresponded with HPE and IBM, requested additional time for opening expert reports, and HPE and IBM have agreed to the proposed extension in good faith. This Motion is not made for purposes of delay, will not prejudice any party, and, if granted, will not interfere with any other deadline in this case.

Dated: June 12, 2025

Respectfully submitted,

/s/ Jefferson Cummings

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**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant, and this motion is unopposed.

/s/ Jefferson Cummings  
Jefferson Cummings

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document on June 12, 2025.

/s/ Jefferson Cummings  
Jefferson Cummings